

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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IN RE: ASHLEY MADISON CUSTOMER  
DATA SECURITY BREACH LITIGATION

) MDL No. 2669

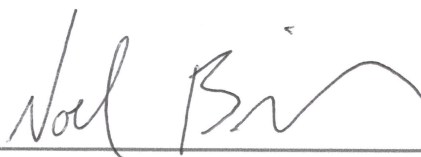
) Case No. 4:15-MD-2669-JAR  
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**DECLARATION OF NOEL BIDERMAN**

1. In July 2015, I was the Chief Executive Officer of Avid Life Media (“ALM”).
2. I had held that position at ALM since October 2010.
3. Beginning in August 2007, when ALM acquired Ashley Madison from Magnolia Stone Corporation (“MSC”), I was the Chief Operating Officer of ALM.
4. I was not the founder of Ashley Madison or the founder of ALM.
5. In addition to my positions at ALM, I also held various officer positions at Avid Dating Life (“ADL”) between January 2009 and August 2015, including Chief Executive Officer, Chief Operating Officer, and President.
6. I have reviewed the First Amended Consolidated Class Action Complaint in this case. The conduct attributed to me in that pleading—assuming but not conceding its truth—relates to actions I took in the scope of my employment at ALM and ADL.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

August 29, 2016  
Toronto, Canada

  
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Noel Biderman